

4. Presently, Defendants' motion for summary judgment is due on March 6, 2020.
5. Due to out of office depositions and court appearances, as well as upcoming personnel changes, undersigned counsel, regrettably, is unable to comply with this deadline.
6. As such, it is respectfully requested that the Court grant an extension of 45 days in which to file a dispositive motion on behalf of Defendant Raymond.
7. It is not believe that this request for extension will be prejudicial to the Plaintiff.

WHEREFORE, Defendant Raymond requests an extension of time to submit the dispositive Motion, supporting documents, and any appropriate responses and replies which may be necessary.

Respectfully submitted,

JOSH SHAPIRO
Attorney General

By: /s/ Yana L. Warshafsky

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KAREN M. ROMANO
Chief Deputy Attorney General
Civil Litigation Section

Date: March 5, 2020

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **MOTION FOR EXTENSION OF TIME** was electronically filed with the Court and served upon the following by first class mail:

Nancy E. Lewen
150 Chad Brown St
Providence, RI 02908

/s/ Yana L. Warshafsky
Yana L. Warshafsky
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Date: March 5, 2020